

Before the
Federal Communications Commission
Washington D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

PR Docket 92-235

In the Matter of

Replacement of Part 90
by Part 88 to Revise
the Private Land Mobile
Radio Services and Modify
the Policies Governing them

To: The Commission

COMMENT OF

Communications Maintenance Inc.
Columbus Indiana Branch
1615 Orinoco Ave.
Columbus In. 47201

Communications Maintenance submits its comments in response to the Commission's Notice of Proposed Rule Making in this proceedings.

1. We are not opposed to implementing more spectrum efficient narrow band technologies when they have been developed and proven in highly congested RF environments.
2. This plan (Part 88) should not be implemented in its present form and time frame. It will put a severe financial burden on all users presently licensed under Part 90. Public Safety and Law Enforcement cannot currently fund Police, Prosecutors, and Courts as well as finance replacement radio systems that use technologies yet undeveloped and untested.
3. After development these changes should be implemented in the top metropolitan areas in the early 2000's, and in rural areas later, on a need to change basis.
4. We are opposed to the consolidation of land mobile services, as it will eliminate the checks and balances between the F.C.C., Coordinators, and Licensees.

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Respectfully submitted

Communications Maintenance Inc.